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January 3, 2023

**By ECF**

The Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Centre Street  
New York, NY 10007

**Re:    *United States v. Sayfullo Saipov*  
          17 Cr. 722 (VSB)**

Dear Judge Broderick,

We write with respect to the protocol for Sayfullo Saipov's use of a prayer rug throughout the duration of his capital trial, which is scheduled to begin with opening statements on January 9, 2023. Having consulted with the United States Marshals Service, I understand that USMS would agree to keep the rug in a storage facility in the courthouse and make it available for Mr. Saipov's daily use, and that USMS will keep the rug in a bag (both of which will be provided by defense counsel) and will arrange for the rug to be cleaned as needed. USMS indicated that it requires the Court's Order directing it to safeguard the prayer rug for the duration of trial, and we respectfully request that the Court endorse this application and direct USMS to keep the prayer rug at the courthouse in a clean and secure location and make it available for Mr. Saipov's use each day he is in court.

Respectfully Submitted,

  
David Patton  
Andrew J. Dalack  
Sylvie J. Levine  
David Stern

Cc: Government Counsel